

EXHIBIT E

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

DECLARATION OF WALTER HENRY CRAMER JR.

I, Walter Henry Cramer Jr., pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Affidavit are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. On September 11, 2001, I was present at the corner of Liberty Street and Cedar Street, adjacent to the WTC complex, when the terrorist attacks of the World Trade Center Towers occurred. I, along with my younger brother and sister-in-law all worked at the WTC complex.

4. I began my day like any other, I was heading into work as the Assistant Vice President of Tax Services at Fiduciary Trust Company (“Fiduciary”) in WTC Tower 2. I had been doing this daily since November 1987. However, by the end of the day, I had lost multiple loved

ones, suffered irreparable and permanent physical disability, and witnessed horrors no one should ever have to experience.

5. I was in New York City at Ground Zero when the plane(s) hit the towers and I received physical injuries in the escape and collapse. I was outside on the street when the South Tower collapsed. In an attempt to avoid falling debris, I dove into a nearby loading dock. I did not immediately seek medical attention because when I finally escaped the chaos and made it home, I was informed that no one had heard from my younger brother or sister-in-law. I put all of my immediate efforts into locating my loved ones. Tragically, neither survived the terrorist attacks on September 11, 2001.

6. As a result of these attacks, I suffered the following specific injuries on September 11, 2001: severe back damage and injuries to my hands. Specifically, according to Dr. Stanton Kofsky, M.D. "There is evidence of mild to moderate disc desiccation and degeneration at L3-4 and a slightly lesser degree of disc desiccation is seen at L4-5 and L5-S1. At L5-S1 there is evidence of a moderate size right posterolateral disc herniation extending into the right lateral recess and proximal right neural foramen inferiorly. This is causing some elements of neural foraminal narrowing. There is moderate left far lateral bulging/herniation at L4-5 causing moderate left foraminal narrowing and left lateral recess narrowing. There is also some mild diffuse annular bulging at the L4-5 level." In 2002 I discontinued my chiropractic care because it was no longer helpful in easing the pain. An EMG revealed that I had a "right S1 radiculopathy and left L5 radiculopathy." I started to experience numbness and weakness in my legs and hands. I also had developed bilateral carpal tunnel syndrome.

7. Due to the nature of my occupation, I was required to remain in a seated position for extended periods of time. My injuries make carrying out a normal work day incredibly difficult.

My treating physician, Dr. Amos Katz, M.D. explains that I have “severe back pain and pain of the lower extremities when sitting for a prolonged period of time or standing for any length of time. This is due to several herniated discs and pinched nerves.” I used to have a daily four hour commute by bus which only worsened my symptoms. In an attempt to move forward, I returned to work from approximately February 2002 until January 2003, at which point I retired.

8. In addition to my physical injuries, I suffer from acute stress reaction. Acute stress reaction occurs when initial traumatic symptoms arise after a traumatic event. I have also developed PTSD, the long-term aftermath of the trauma. I was unable to return to the city or my job for over 5 months because of the attacks, and only returned to work for approximately one year before needing to retire permanently. I experience nightmares, intrusive thoughts, and feelings of sadness, remorse and intense feelings of survivor’s guilt. After the attacks, I was unable to engage with other people due to an overwhelming feeling of anxiousness. To this day I experience problems with sleeping and when I am able to sleep I have vivid nightmares. Following the attacks, I did not leave my home and watched CNN almost continuously. While trying to address my own trauma and injuries, I was deeply concerned for my parents. They had been provided with remains of what they believed to be my brother, but there was some confusion about the accuracy. I would describe my brother as my “best friend” and still have trouble dealing with his untimely death.

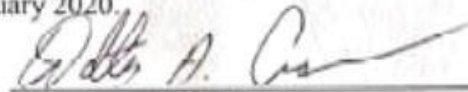
9. I sought medical attention for my injuries. I have consulted with a psychiatrist, a chiropractor, a neurologist and my family goes to group counseling. Attached as Exhibit B to this Declaration is a true and correct copy of my medical records related to the treatment that I received following the September 11, 2001 terrorist attacks.

10. I previously pursued a claim (Claim Number VCF 212-001065) through the September 11th Victim Compensation Fund specifically related to my physical injuries incurred on September 11, 2001, and my claim was determined to be eligible for compensation.

11. Additionally, I filed a claim under USVSST on behalf of my late brother, Christopher Cramer. On October 30, 2017, I received an award in the amount of \$178,308.93. After multiple correspondences with the fund, I returned the full payment amount, which was received by the fund on April 2, 2019. I am now submitting a claim to USVSST on my behalf.

I declare UNDER PENALTY OF PERJURY that the foregoing is true and correct.

EXECUTED on this 29 day of January 2020.

A handwritten signature in black ink, appearing to read "D. A. Cramer", written over a horizontal line.

Signature of Declarant

Exhibits Filed Under Seal